

PROSKAUER ROSE LLP  
Ehud Barak, Esq.  
Russell T. Gorkin, Esq.  
Elliot R. Stevens, Esq.  
Eleven Times Square  
New York, NY 10036-8299  
Telephone: 212-969-3000  
Facsimile: 212-969-2900  
Email: ebarak@proskauer.com  
rgorkin@proskauer.com  
estevens@proskauer.com

**Hearing Date: November 16, 2022**  
**Response Date: June 15, 2022**  
**Reply Date: July 15, 2022**

*Attorneys for Defendants Grosvenor Investment Management Ltd.,  
Grosvenor Private Reserve Fund Limited,  
Grosvenor Balanced Growth Fund Limited and  
Grosvenor Aggressive Growth Fund Limited*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.
In re:  BERNARD L. MADOFF  Debtor.
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,  Plaintiff,  v.  GROSVENOR INVESTMENT MANAGEMENT LTD., GROSVENOR PRIVATE RESERVE FUND LIMITED (in liquidation), GROSVENOR

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01021 (BRL)

**ORAL ARGUMENT REQUESTED**

BALANCED GROWTH FUND LIMITED (in liquidation) AND GROSVENOR AGGRESSIVE GROWTH FUND LIMITED (in liquidation),

Defendants.

**NOTICE OF HEARING ON MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT on April 15, 2022, Defendants Grosvenor Investment Management Ltd., Grosvenor Private Reserve Fund Limited, Grosvenor Balanced Growth Fund Limited, and Grosvenor Aggressive Growth Fund Limited (collectively, the “Grosvenor Defendants”), by and through the undersigned counsel, filed a motion for an order dismissing the Complaint filed by Irving H. Picard, Trustee (the “Trustee”) for the Liquidation of Bernard L. Madoff Securities Investment Securities LLC with prejudice pursuant to Rules 8(a), 10(c), 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Grosvenor Defendants’ motion to dismiss will be held on November 16, 2022 at 10:00 a.m. EDT, or as soon thereafter as counsel may be heard, in the courtroom of The Honorable Chief Judge Cecelia G. Morris, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris’ guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order in this proceeding entered February 15, 2022, the Trustee shall respond to the motion to dismiss by June 15, 2022 and the Grosvenor Defendants shall file its reply by July 15, 2022.

Dated: May 6, 2022  
New York, New York

PROSKAUER ROSE LLP

By: s/ Ehud Barak  
Ehud Barak  
Russell T. Gorkin  
Elliot R. Stevens  
Eleven Times Square  
New York, NY 10036-8299  
Telephone: (212) 969-3000  
Facsimile: (212) 969-2900  
Email: ebarak@proskauer.com  
rgorkin@proskauer.com  
estevens@proskauer.com

*Attorneys for Defendants Grosvenor  
Investment Management Ltd., Grosvenor  
Private Reserve Fund Limited, Grosvenor  
Balanced Growth Fund Limited and  
Grosvenor Aggressive Growth Fund Limited*